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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of

Administration of the  
North American Numbering Plan:  
Phase I

)  
)  
) CC Docket No. 92-237  
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Comments of the  
INFORMATION INDUSTRY ASSOCIATION

The Information Industry Association ("IIA") hereby files these comments in the instant proceeding concerning improvements in the North American Number Plan ("NANP"), personal communications service numbering plan schemes and local number portability as part of the examination of NANP Administration (NANPA) issues in the above-captioned docket.(1) IIA earlier has stated, based on the limited availability of specifically appealing numbering arrangements, that it believes the assignment of numbers should be within the constraints of balanced national number assignment policies; which promote diversity of services; and allow for consistency in access and availability.(2)

IIA is a trade association representing some 500 companies pursuing business opportunities associated with the creation, distribution and use of information. Since 1968, IIA has grown to include entrepreneurs and established companies that use a wide range of communications media, including local exchange and interexchange carriers, to distribute information worldwide.

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(1) Administration of the North American Numbering Plan, CC Docket No. 92-237 (released Oct. 29, 1992) ("Notice").

(2) IIA Comments, The Use of N11 Codes and Other Abbreviated Arrangements, CC Docket No. 92-105 (filed June 5, 1992).

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List A B C D E

## **I. IIA Supports the Adoption of a Balanced National NANP**

IIA always has argued for uniform rules to protect the enhanced services industry, especially as it develops on a regional and national basis. A balanced national numbering plan, which allows full and equal participation of all parties with a stake in the assignment of numbers, is necessary to meet the public interest.

For example, IIA has noted that despite the long-term success of abbreviated dialing numbers -- whose value is in their short, easily recognizable number assignments linked to a particular service -- the dearth of resources mandates other alternatives.<sup>(3)</sup> Consequently, IIA favors an application-based approach to the assignment of numbers. IIA has concluded numbering plans should be developed with an eye toward service access codes in seven or 10 digit assignment schemes.

Access code arrangements would allow all carriers -- whether local exchange, interexchange, alternative service or mobile -- an equal number of access opportunities that could be shared with the myriad of service providers of the Information Age. This would allow the maintenance of a balanced use of number combinations to be designated as access numbers for information, personal or other enhanced services. Such allocation should be based on national guidelines that promote diversity and consistency for businesses and consumers across the country. The ultimate result would be that these codes would be allocated on a fair and equitable basis that guaranteed the same competitive advantages to all players and under a rational plan making the codes consistently available nationally.

## **II. Administration of the NANP Should Include the Promotion of Diversity**

IIA also is concerned that administration of the NANP proceed with a sense of responsibility to the promotion of diversity of services.

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(3) Id.

Unfortunately, as currently structured, an abundance of the responsibility for management of number availability rests with carriers which are in direct competition with enhanced service providers and others interested in seeking key number combinations.

IIA agrees with a number of parties that have commented to this Commission that administration of the NANP by Bell Communications Research ("Bellcore") involves inherent conflict of interests and that Bellcore staff must inevitably be influenced by the views of its owners -- the Bell Operating Companies.(4) Moreover, IIA remains convinced that any number assignment should be executed in a non-discriminatory manner that affords equal advantages to all users of the NANP.

IIA members have experienced that the allocation of NANP codes by Bellcore has neither guaranteed national consistency in their use nor assignment. Bellcore and local exchange company participants therein are in the unfair position of deciding the best allocation methods for equity and the public interest. Uniform national policies, and greater Commission oversight, can bring stability and growth to the enhanced services industry in particular, and the telecommunications industry, in general. Further, Commission participation could provide a much-needed mechanism for the resolution of deadlocks when consensus has failed and to expedite the numbering process overall.(5)

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(4) Notice at para. 25.

(5) The Commission has expressed particular concern about the additional costs and administrative burdens associated with the administration of the NANP and how those costs potentially might be managed. Although IIA is not prepared at this time to offer specific recommendations on these matters, the adoption of an internationally integrated numbering plan, coupled with integrated centralized administration would certainly greatly benefit America's competitive edge domestically and worldwide.

### **III. The NANP Must Reflect Consistency in Access and Availability of Assignments**

IIA members are involved in a wide variety of telecommunications and information services and are particularly concerned that NANP activities not prejudice the full integration of these new services into the telecommunications infrastructure. For example, with regard to personal communications systems, although numbering for such systems is the subject of both domestic and international considerations, IIA believes that any U.S. numbering plan must fully consider the worldwide development and deployment of this technology. Similarly, IIA's members which provide enhanced services are particularly interested in achieving local number portability and the increased competition such portability would afford at the local loop.

IIA recognizes that the advances in customer premises equipment mean that residential, cellular and other telephone users have access to equipment with speed-dialing or other connecting shortcuts that may obfuscate the need for changes in the NANP. However, the variety of enhanced services, offered on local, regional and national levels, weighs heavily in favor of a consistent number interface for access to these services. Such expedited, consistent and predictable access arrangements can encourage the acceptance of new and existing enhanced services for American business and consumer users.

The Association also recognizes that any numbering scheme does not, and should not, automatically determine a particular access arrangement for charging purposes. Regardless of the ultimate numbering arrangement adopted or how it is managed, the Commission must zealously assure that creation of a nationally accessible numbering scheme does not discriminate in availability of services or with regard to charges for access

arrangements. No central office configuration should be equated to Feature Group B or D access -- whether through special access charges for "950-XXXX," "800-XXX-XXXX," or any other arrangement -- and rates applied to all dialing arrangements should be based fairly upon directly associated costs.

#### IV. Conclusion

IIA is convinced that improvements can be made to the existing national numbering scheme which will be an asset for the information industry and all Americans. IIA encourages the Commission to move forward with the goal of promoting diversity to achieve a balanced national plan of number allocation that assures consistency in access and availability in the assignment of numbers throughout the country.

Respectfully submitted,



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